

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHINITA WASHINGTON, individually and on )  
behalf of the classes defined herein, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
RJM ACQUISITIONS, LLC, )  
 )  
Defendant. )

Case No.: 08 CV 2825

Judge Aspen

**AGREED MOTION FOR AN ENLARGEMENT OF TIME AND TO RE-SET THE  
INITIAL STATUS HEARING**

Defendant, RJM Acquisitions, LLC ("RJM") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Amended Complaint, states as follows:

1. On or about May 15, 2008, plaintiff filed a class action Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA"). An Amended Complaint was filed on June 25, 2008. (Dkt. #17)

2. Defendant's responsive pleading is due Monday, July 14, 2008.

3. The parties' initial status hearing is set for July 24, 2008 at 10:30 a.m.

4. Since the receiving this case, defense counsel has been diligently working with its client to obtain all the necessary information in its possession related to the allegations made in the complaint. The allegations involve claims under the FDCPA as well as two Illinois statutes, the Illinois Collection Agency Act ("ICAA") and the Consumer Fraud Act ("CFA") concerning a pleading filed in a state court collection case.

5. Plaintiff's Amended Complaint naming a new class representative and new theory under §1692e of the FDCPA.

6. At the time this motion is filed, defense counsel has not received all the information from the client regarding the newly named plaintiff and the allegations in the Amended Complaint to permit her to prepare a response.

7. The undersigned will be out of town July 29, 2008 until August 2, 2008.

8. On July 7, 2008, defense counsel discussed the additional time with counsel for the plaintiffs and counsel for the plaintiffs has no objection.

9. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

10. The parties also request that the court re-set the parties' initial status hearing, currently set for July 24, 2008 at 10:30 a.m., to a date after the pleading date of August 5, 2008 defendant seeks herein.

WHEREFORE, Defendant, RJM Acquisitions, LLC, respectfully, requests that this Court grant it additional time, up to and including August 5, 2008, to file its responsive pleading to plaintiff's Amended Complaint and that the court enter an order re-setting the parties' initial status hearing to a date following August 5, 2008.

Respectfully Submitted,

s/Corinne C. Heggie  
One of the attorneys for  
**RJM Acquisitions, LLC**

David M. Schultz  
Corinne C. Heggie  
HINSHAW & CULBERTSON LLP  
222 N. LaSalle Street, Suite 300  
Chicago, IL 60601-1081  
312-704-3000